

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.

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Upon the Declaration of Jonathon D. Warner, Esq., dated April 17, 2025, with exhibits, and upon all the prior papers and proceedings heretofore had herein,

LET defendants Safa Abdulrahim Gelardi, Vito Gelardi and IME Companions LLC show cause before this Court, before the Hon. Pamela K. Chen, U.S.D.J., on the \_\_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_ o'clock, or as soon thereafter as counsel can be heard, at the courthouse located at 225 Cadman Plaza East, Brooklyn, New York, why an Order should not be made and entered:

a. Pursuant to C.P.L.R. § 321(b)(2), Rule 1.16(c)(4)(5)(7) of the Rules of Professional Conduct (22 NYCRR 1200.0), New York Judiciary Law § 475 and Local Rule 1.4, permitting Warner & Scheuerman to withdraw as attorneys of record for defendants Safa Abdulrahim Gelardi, Vito Gelardi and IME Companions LLC;

b. Pursuant to New York's C.P.L.R. § 321(c), staying all proceedings until thirty (30) days after Defendants are served with an Order permitting Warner & Scheuerman to withdraw as counsel; and

Case No.: 1:22-cv-1032 (PKC)(JRC)

**ORDER TO SHOW CAUSE  
TO BE RELIEVED AS  
COUNSEL FOR DEFENDANTS**

c. Granting such further relief as may be just.

**SUFFICIENT** cause appearing therefor, it is

**ORDERED**, that pending the hearing and determination of this motion and for thirty (30) days thereafter, all actions, deadlines and proceedings herein are hereby tolled and/or stayed, and it is further

**ORDERED**, that service of a copy of this Order, together with the papers upon which it is based, upon defendants Safa Abdulrahim Gelardi, Vito Gelardi and IME Companions LLC by email to Safa Gelardi and by email to Vito Gelardi on or before the \_\_ day of April, 2025, be deemed good and sufficient service; and it is further

**ORDERED**, that the uploading of the instant Order to Show Cause and its Supporting Declaration via ECF be deemed good and sufficient service upon plaintiff and all other appearing parties; and it further

**ORDERED**, that defendants Safa Abdulrahim Gelardi, Vito Gelardi and IME Companions LLC may appear virtually at any hearing to be held on this application.

**SO ORDERED:**

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Hon. Pamela K. Chen, U.S.D.J.